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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JAMES COPPAGE :
Plaintiff, : Civil Action
vs. : No.
: 1-18-cv-03823-
UNITED STATES STEEL : GLR
CORPORATION, et al., :
Defendants. :

November 21, 2019

Oral Deposition of ROBERT F.
HERRICK, Sc.D., CIH, FAIHA, taken pursuant
to Notice at Veritext-Boston, 101 Arch
Street, Suite 650, Boston, Massachusetts
02110, beginning at 9:09 a.m. before
Brigitte A. Strain, a Federally Approved
Registered Professional Reporter and Notary
Public.

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ROBERT F. HERRICK, Sc.D., CIH, FAI233
1 assessment?

2 MR. DuPONT: Objection, form.

3 THE WITNESS: Not directly.

4 You know, the calculations included
5 the exposure, you know, that I
6 considered to be part of the
7 production printing process. And
8 then I separately calculated the
9 exposure from the cleaning steps.
10 But, again, those weren't unique to a
11 BASF product.

12 BY MS. DOWNIE:

13 Q. Bear with me here for one
14 moment.

15 Then, just to be clear for the
16 record, you have no opinion that Rycoline
17 products contributed to Mr. Coppage's
18 alleged benzene exposure. Correct?

19 MR. DuPONT: Form.

20 THE WITNESS: Yeah. I didn't
21 see Rycoline products mentioned
22 anywhere in the record.

23 BY MS. DOWNIE:

24 Q. And as to Sun Chemical, the

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1 ROBERT F. HERRICK, Sc.D., CIH, FAI220
2 solvent from U.S. Printing Ink, Sun
3 Chemical and of Hanco. And so he
4 identified those manufacturers or
5 suppliers, whatever, you know, in his
6 deposition. So I do have that
7 information.

8 BY MS. DOWNIE:

9 Q. Do you have any information
10 regarding the names of any solvents that Sun
11 Chemical manufactured?

12 MR. DuPONT: Form, vague.

13 THE WITNESS: There was -- you
14 know, it wasn't something that was
15 specified, you know, in that level of
16 detail, by Stallings anyway. So he
17 identified Sun Chemical, but he
18 didn't, you know, have any detail
19 beyond that.

20 BY MS. DOWNIE:

21 Q. Okay. And as for U.S. Printing
22 Ink, do you have any information regarding
23 the specific solvents that Mr. Coppage was
24 allegedly exposed to?

MR. DuPONT: Objection, form.

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1 THE WITNESS: No. Again, we've
2 got the identity as Stallings
3 reported it, but not, you know, any
4 detail as to the particular product
5 name.

6 BY MS. DOWNIE:

7 Q. And if you don't know the name
8 of the product, can you tell me the specific
9 chemical composition of those products?

10 MR. DuPONT: Form.

11 THE WITNESS: The information
12 we have, you know -- and, again, I'm
13 still on my page 16 -- that he
14 described it as wash oil, clear
15 liquid with a sweet smelling odor. I
16 mean that was, you know, his
17 discussion. So that's not, you know,
18 as good as a, you know, detailed
19 chemical analysis. But that's pretty
20 much the information that we have.

21 BY MS. DOWNIE:

22 Q. During what time period do you
23 believe Mr. Coppage was exposed to the
24 products you just described?

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1 apprenticeship. So he was rotating. And
2 that was '65 to '69.

3 And then he was back at the
4 Sun pretty much '99 to 2006.

5 So those would be the time
6 intervals.

7 Q. Did he specifically testify
8 that he recalled using those solvents
9 throughout the entirety of those time
10 periods?

11 MR. DuPONT: Objection, form.

12 THE WITNESS: I think, you
13 know, given what we know about the
14 manufacturing process, you know, the
15 printing process, that it is
16 reasonable to say that he used those
17 materials throughout that time, yeah.

18 BY MS. DOWNIE:

19 Q. I think you actually testified
20 earlier that you have no information
21 regarding the benzene content of any Sun
22 Chemical solvents. Is that correct?

23 MR. DuPONT: Objection, form.

24 Misstates testimony.

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1 THE WITNESS: I don't have the
2 composition specifically.

3 BY MS. DOWNIE:

4 Q. Let me ask the question
5 differently then. Do you have any
6 information regarding the benzene content of
7 the Sun Chemical solvents described by
8 plaintiff?

9 MR. DuPONT: Form.

10 THE WITNESS: I don't have, you
11 know, the composition at the
12 individual product level, no.

13 BY MS. DOWNIE:

14 Q. Do you have any information
15 regarding the benzene content of the U.S.
16 Printing Ink solvent described by plaintiff?

17 MR. DuPONT: Objection, form.

18 THE WITNESS: No. The same
19 answer. It isn't really available in
20 that level of detail.

21 BY MS. DOWNIE:

22 Q. Other than the solvents that
23 we just talked about with regard to Sun
24 Chemical and U.S. Printing Ink, are there

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1 ROBERT F. HERRICK, Sc.D., CIH, FAI230
2 very basic level. And this is
3 discussed a little bit in that paper.
4 What's the author? I keep blanking on
5 this guy's name.

6 MR. DuPONT: Do you want to
7 look at it to refresh your
8 recollection?

9 THE WITNESS: Sure, yeah.
10 There is a general discussion,
11 and also there's some information in
12 that -- Yeah. Here it is. I was
13 thinking of the Novick article,
14 there's an overview of the
15 ingredients that are present in inks,
16 including black ink.

17 And then that testimony to
18 OSHA that we were talking about
19 earlier from the trade association
20 included, you know, a discussion
21 about the composition of ink. So
22 there is some information available.

23 BY MS. DOWNIE:

24 Q. In conducting your exposure
assessment, did you take into account any

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1 Sun Chemical products?

2 MR. DuPONT: Form.

3 THE WITNESS: Well, not
4 uniquely, I mean. You know, because
5 what we had was the information about
6 the cleaning process, you know, which
7 could have included and, in fact, did
8 include Sun products. And so that
9 was part of the calculation to model
10 his exposure around the cleaning
11 steps.

12 But again, you know, it wasn't
13 done uniquely to try to identify the
14 contribution from the Sun products.

15 BY MS. DOWNIE:

16 Q. And, just to be clear, that
17 assumption, or that inclusion, is based upon
18 the assumption that Sun Chemical Company
19 manufactures solvents; is that correct?

20 MR. DuPONT: Objection, form.

21 THE WITNESS: I'm sorry, the
22 last word was manufactured --

23 BY MS. DOWNIE:

24 Q. Solvents.